

William J. Palatucci, Esq.
Mark M. Makhail, Esq.
McCarter & English, LLP
Four Gateway Center
100 Mulberry Street
Newark, New Jersey 07102
(973) 639-7940
*Attorneys for Proposed Intervenor
Cumberland Regular Republican
Organization, Inc.*

**UNITED STATES DISTRICT COURT
DISTRICT OF NEW JERSEY**

CHRISTINE CONFORTI, ARATI
KREIBICH, MICO LUCIDE, JOSPEH
MARCHICA, KEVIN MCMILLAN,
ZINOVIA SPEZAKIS, and NEW JERSEY
WORKING FAMILIES ALLIANCE, INC.,

Plaintiff,

v.

CHRISTINE GIORDANO HANLON, in
her official capacity as Monmouth County
Clerk, SCOTT M. COLABELLA, in his
official capacity as Ocean County Clerk,
PAULA SOLLAMI COVELLO, in her
official capacity as Mercer County Clerk,
JOHN S. HOGAN, in his official capacity
as Bergen County Clerk, EDWARD P.
MCGETTIGAN, in his official capacity as
Atlantic County Clerk, and E. JUNIOR
MALDONADO, in his official capacity as
Hudson County Clerk,

Defendants.

Civil Action No.: 3:20-08267-ZNQ-TJB

**CERTIFICATION OF WILLIAM J.
PALATUCCI IN SUPPORT OF
PROPOSED INTERVENOR
CUMBERLAND REGULAR
REPUBLICAN ORGANIZATION, INC.'S
MOTION TO INTERVENE**

William J. Palatucci, Esq., hereby certifies as follows:

1. I am an attorney at law of the State of New Jersey and a partner at the firm McCarter & English, LLP, attorneys for Proposed Intervenor Cumberland Regular Republican Organization, Inc. (“CRRO”). I am personally handling this matter and am familiar with the facts of this case as they relate to CRRO.

2. This Certification is submitted in support CRRO’s Motion to Intervene pursuant to Federal Rule of Civil Procedure 24.

3. CRRO is a not-for-profit corporation of the State of New Jersey

4. CRRO is the official Republican Party organization of Cumberland County, registered with the New Jersey Election Law Enforcement Commission with its leadership being duly elected by County Committee members who themselves are chosen by Republican voters in a primary election every two years.

5. The mission of CRRO is to promote the principles of the party and to recruit, train and support candidates for the nomination of the Republican Party in primary elections for public offices, including President of the United States, United States Senate and Congress, State Senate and Assembly, Constitutional County offices, members of the Board of Commissioners, and municipal offices.

6. Qualified members of the Republican Party may, pursuant to N.J.S.A. 19:23-17, be permitted to use the designation “Cumberland Regular Republican Organization,” as their designation or slogan in primary elections.

7. The CRRO, by doing so, “endorses” those candidates who adopt and share the principles and ideals of CRRO.

8. CRRO claims an interest, protected by the First Amendment, to associate itself with primary election candidates who share its principles and ideals, and to associate those candidates with each other, and to inform the primary election voters of the Republican Party.

9. CRRO further claims an interest, protected by the First Amendment, to speak freely as to those candidates that it has endorsed so as to inform the electorate that the CRRO has chosen to associate itself with certain candidates, and that those candidates have chosen to associate themselves with each other.

10. Given the nature of the organization and the legal principles at issue in this litigation, CRRO claims an interest pursuant to Rule 24(a) because the disposition of the subject of this action, pertaining as to does to ballot placement and bracketing, may impair or impede the CRRO's ability to carry out its core function, that is, the ability to endorse candidates on the ballot, and to have those endorsed candidates be associated with each other on the ballot.

11. CRRO also has claims or defenses pursuant to Rule 24(b), that is, its First Amendment claims set forth above, that present common questions of law and fact with the claims and defenses of the existing parties

I certify that the above statements made by me are true. I am aware that if any of the foregoing statements made by me are willfully false, I am subject to punishment.

s/ William J. Palatucci

William J. Palatucci, Esq.

Dated: August 31, 2022